

PUBLIC DISCLOSURE

February 18, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

SunTrust Bank, Tampa Bay
06121492

Tampa, Florida

Federal Reserve Bank of Atlanta
104 Marietta Street, N.W.
Atlanta, Georgia 30303

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **SunTrust Bank, Tampa Bay, Tampa, Florida**, prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **February 18, 1997**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

SUMMARY

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

SunTrust Bank, Tampa Bay's overall CRA performance is rated satisfactory based on a review of its qualified loans, investments, and services within the assessment area. Management has taken an active and affirmative role in meeting credit needs throughout the assessment area, including in low- and moderate-income areas, to low- and moderate-income individuals, and to small businesses and farms, in a manner consistent with the bank's resources, capabilities, and operating philosophies.

A high percentage of the bank's loans were originated in its assessment area. Loans to small businesses reflect reasonable penetration throughout most of the bank's assessment area. Loans secured by real estate, specifically loans secured by one- to four-family residential properties, account for a majority of the bank's loan portfolio. Commercial and industrial loans followed by loans to individuals (consumer loans) also make up a large percentage of the bank's portfolio and are all considered in the lending test. The bank has used innovative and flexible lending practices to serve assessment area credit needs.

The bank maintains a minimal level of qualified investments. The use of innovative or complex investments to support community development initiatives is rare.

The extent of branch services was similar throughout the bank's assessment area. The bank's services do not vary in a manner that inconveniences portions of the assessment area, particularly low- and moderate-income geographies or individuals. Branch services are complemented by a network of 48 automated teller machines (ATMs) and other alternative systems for delivering retail banking services. The bank maintains an adequate level of community development services targeted specifically to the assessment area.

SUMMARY (CONTINUED)

The following table indicates the performance level of **SunTrust Bank, Tampa Bay** with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	SUNTRUST BANK, TAMPA BAY ----- PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve		X	
Substantial Noncompliance			

*Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

DESCRIPTION OF INSTITUTION

SunTrust Bank, Tampa Bay (SunTrust) is an affiliate of SunTrust Banks, Inc., Atlanta, Georgia. SunTrust operates 40 branches with drive-through and ATM facilities in various locations. The bank reported assets of \$2.1 billion on December 31, 1996. No legal or financial impediments that would hinder the bank's ability to help meet the credit needs of the community were noted.

SunTrust offers a variety of credit products to meet the community's credit needs. The types of credit products offered by the bank, as listed in the bank's public file, include consumer loans, real estate loans, business loans, and loans to government entities.

The bank reported the following loan portfolio mix as of December 31, 1996:

LOAN TYPE	PERCENTAGE
Construction and development	3.6
Secured by one- to four-family dwellings	31.3
Other real estate:	
Farmland	0.4
Multifamily	2.9
Nonfarm nonresidential	8.8
Commercial and industrial	25.5
Loans to individuals	20.3
All other	7.2
Total	100.0

As illustrated above, the largest portion of the bank's portfolio consists of loans secured by one- to four-family residential properties followed by commercial and industrial loans and loans to individuals. SunTrust has begun to focus on small business lending as part of its overall business strategy. With this added emphasis, the percentage of commercial and industrial loans in the bank's portfolio is expected to increase.

DESCRIPTION OF ASSESSMENT AREA

The bank's assessment area is located in the Tampa-St. Petersburg-Clearwater Metropolitan Statistical Area (MSA) #8280, the largest MSA in Florida. MSA 8280 is made up of four counties: Hillsborough, Pinellas, Pasco, and Hernando. The bank's assessment area includes 359 census tracts in Pinellas and Hillsborough counties. Of these census tracts, 23 are low-income tracts; 68 are moderate-income tracts; 166 are middle-income tracts; and 102 are upper-income tracts. Four of the low-income tracts and two of the moderate-income tracts have little or no population.

Population Summary

According to 1990 Census data, the total population of the bank's assessment area was 1,685,713, which represented 82 percent of the total population of the MSA and 13 percent of the total population of the state. The University of Florida's Bureau of Economic and Business Research estimated a 6 percent increase in population for the assessment area and a 7 percent increase in population for the MSA for 1996.

The following table shows the assessment area's family demographics based on census tract income level.

CENSUS TRACT INCOME LEVEL	NUMBER OF FAMILIES IN CENSUS TRACT INCOME CATEGORY	PERCENTAGE OF TOTAL FAMILIES
Low-income	10,439	2.3
Moderate-income	65,712	14.3
Middle-income	216,817	47.1
Upper-income	166,833	36.3
Assessment Area Total	459,801	100.0

DESCRIPTION OF ASSESSMENT AREA (CONTINUED)

Income Characteristics

Approximately 460,000 families live in the bank's assessment area, with the largest percentage residing in middle-income census tracts. The 1990 median family income of the assessment area was \$33,101 compared to \$32,212 for the state. Of the 460,000 families, 17 percent are low-income, 18 percent are moderate-income, 23 percent are middle-income, and 42 percent are upper-income. Approximately 35 percent of families are considered low- to moderate-income compared with 38 percent for both the MSA and the state. 8 percent of families live below the poverty level in the assessment area, which is slightly lower than the state's 9 percent poverty level. The percentage of middle-income families in the assessment area is similar to both the state and the MSA percentages. The percentage of upper-income families in the assessment area is slightly higher than the state and MSA percentages.

Housing Characteristics

According to the 1990 Census, the number of housing units in the bank's assessment area totaled 826,081. These units consisted of one- to four-family units (62.8 percent), followed by multifamily units (24.7 percent) and mobile homes (11.5 percent). A slightly higher percentage of multifamily units exists in the assessment area than in the MSA and the state. The assessment area has a slightly smaller percentage of mobile homes than the MSA and the state.

Of the 826,081 housing units in the assessment area, 56.7 percent are owner-occupied units, 28.7 percent are rental units, and 14.6 percent are vacant units. The table below distributes the percentage of owner-occupied housing by census tract income level.

CENSUS TRACT INCOME LEVEL	TOTAL UNITS	OWNER- OCCUPIED UNITS	PERCENTAGE OF OWNER- OCCUPIED UNITS TO TOTAL UNITS
Low-income	20,785	5,348	25.7
Moderate-income	135,644	60,707	44.8
Middle-income	396,279	226,802	57.2
Upper-income	273,373	175,493	64.2
Total	826,081	468,350	56.7

DESCRIPTION OF ASSESSMENT AREA (CONTINUED)

Housing Characteristics (Continued)

Most of the owner-occupied units in the assessment area are in middle- and upper-income census tracts. 74 percent of housing units in low-income tracts are rental and vacant units. 919 (4 percent) of the total number of housing units in low-income census tracts are boarded-up.

The housing stock is oldest in low-income census tracts, followed by moderate-income census tracts. According to the 1990 Census, the median age of the housing stock in low-income tracts was 40 years, which was at least 18 years older than the median age of the housing stock in middle- and upper-income tracts. Given the older, rental housing stock in low- and moderate-income tracts, residents of or investors in these tracts may generate a higher demand for home improvement or rehabilitation loans.

Affordability Summary

According to 1990 Census data, the median housing value in the bank's assessment area was \$73,041 compared with \$76,487 for the state. Gross median rent in the assessment area equaled \$454 compared with \$481 for the state.

Approximately 13.5 percent of total households in the assessment area spend more than 30 percent of their income on rent or housing. Approximately 30 percent of households in low-income tracts spend more than 30 percent of their income on rent. In moderate-income tracts, 21 percent of households spend more than 30 percent of their income on rent. Many renters, particularly in low-income census tracts, may be unable to purchase a home. Although there seems to be no significant difference in overall housing affordability in the assessment area as compared to the state, housing affordability may be a problem for low- and moderate-income families in the assessment area.

DESCRIPTION OF ASSESSMENT AREA (CONTINUED)

Economic Patterns

Like most major cities in Florida, the economy in the bank's assessment area is supported primarily by tourism, business, agriculture, and financial services. According to the 1993 County Business Patterns data compiled by the U.S. Census Bureau, the three major types of industry in each county are as follows:

TYPE OF INDUSTRY	NUMBER OF EMPLOYEES		NUMBER OF ESTABLISHMENTS	
	Pinellas	Hillsborough	Pinellas	Hillsborough
Services and Other	127,881	159,155	10,186	9,256
Retail Trade	80,739	76,811	5,810	5,286
Finance, Insurance, and Real Estate		40,469		2,525
Manufacturing	45,053		1,340	

The 1993 U.S. Census employment data for county business patterns show a total of 48,081 businesses in the bank's assessment area. Of the 48,081 businesses, 45,543 (95 percent) are small businesses with fewer than 50 employees.

According to the Bureau of Labor Statistics, the latest unemployment rate dated November 1996 for Pinellas and Hillsborough counties combined was approximately 3.5 percent, which is significantly lower than the 4.8 percent unemployment rate for the state of Florida and the national unemployment rate of 5.0 percent. The decrease from the 4.9 percent unemployment rate in 1990 to the recent 3.5 percent unemployment rate is one indication of economic growth. In addition to the decline in the unemployment rate and the overall growth in population and employment, per capita personal income increased approximately 18.9 percent in the assessment area from 1990 to 1994.

According to the Census Bureau, residential building permits grew 40 percent from 1991 to 1994. During this four-year period, new residential permits for the MSA steadily increased from 8,151 in 1991 to 11,376 in 1994. A slight decrease of 15 percent occurred between 1994 and 1995 for residential building permits. Multifamily permits fluctuated from 1991 to 1995. The highest number of multifamily permits extended totaled 3,833 in 1995.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

I. LENDING TEST

Assessment Area Concentration

A high percentage of the loans are extended in the bank's assessment area. The table below shows the distribution of loans extended inside and outside the bank's assessment area since the previous examination.

LOAN TYPE	INSIDE ASSESSMENT AREA		OUTSIDE ASSESSMENT AREA	
	Number	Percent	Number	Percent
Home Equity ¹	385	96	18	4
Home Improvement ²	425	96	19	4
Home Purchase ²	1,180	91	119	9
Motor Vehicle ¹	5,700	70	2,431	30
Other Consumer Secured ¹	890	94	61	6
Other Consumer Unsecured ¹	213	92	18	8
Refinancing ²	602	92	54	8
Small Business	951	89	123	11

Of the 13,189 loans sampled, 10,346 (78 percent) were extended within the bank's assessment area. The types of loans with the greatest concentration inside the assessment area were Home Mortgage Disclosure Act (HMDA) reportable loans at 92 percent, followed by small business loans at 89 percent and consumer loans at 74 percent.

Lending Distribution by Geography

The geographic distribution of loans reflects adequate penetration throughout the bank's assessment area including low- and moderate-income census tracts. The following chart displays the geographic distribution of loans by the income level of the census tract.

¹Consumer loans.

²HMDA-reportable loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

I. LENDING TEST (CONTINUED)

Lending Distribution by Geography (Continued)

CENSUS TRACT INCOME LEVEL	PERCENTAG E OF TOTAL TRACTS	PERCENTAG E OF TOTAL FAMILIES	PERCENTAGE OF LOANS		
			HMDA	CONSUMER	SMALL BUSINESS
Low-income	6.5	2	1	0	1
Moderate-income	18.9	14	8	8	23
Middle-income	46.2	47	35	42	40
Upper-income	28.4	37	56	50	36
Total	100.0	100	100	100	100

The bank performed reasonably well in extending small business loans in all geographies when compared to the number of families in each geography. However, opportunities for originations of HMDA-reportable loans in low- and moderate-income census tracts may not be in proportion to the number of families. 57 percent of housing units in low-income census tracts and 37 percent of units in moderate-income census tracts are nonowner-occupied and 51 percent and 20 percent of the households in low-income and moderate-income census tracts, respectively, are below the poverty level. Because 51 percent of the households are below poverty and more than half of the housing is nonowner-occupied in the low-income tract level, very little consumer and mortgage lending activity is expected in low-income tracts. The bank has better opportunities and higher originations in relation to the number of families in moderate-income census tracts for both HMDA-reportable loans and consumer loans. 80 percent of the households in moderate-income census tracts are above the poverty level, and the median income for families living in moderate-income tracts is approximately \$22,000. The bank exhibited reasonable penetration of middle-income census tracts for all loan types.

Lending Distribution by Borrower Income or Business Revenue

The following table shows the distribution of loans extended to borrowers of different income levels.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

I. LENDING TEST (CONTINUED)

Lending Distribution by Borrower Income or Business Revenue (Continued)

BORROWER/FAMILY INCOME LEVEL	PERCENTAGE OF TOTAL FAMILIES	PERCENTAGE OF LOANS	
		HMDA	CONSUMER
Low-income	16.8	9	9
Moderate-income	17.9	16	18
Middle-income	22.8	19	22
Upper-income	42.5	56	51
Total	100.0	100	100

Considering income characteristics of the assessment area's population, the bank has a good record of lending to borrowers of different income levels with regard to all loan types. 8 percent of the families in the assessment area are below the poverty level, and those families that are considered low-income earn approximately \$16,500 or less annually. As a result, a lower percentage of loan originations is expected for low-income applicants.

Commercial loans account for approximately 26 percent of the bank's loan portfolio. 508 out of 939 (54 percent) loans originated were extended to businesses with revenues of less than \$1 million. The following chart depicts, by loan size, the number and dollar volume of small business loans that were made in the bank's assessment area since the last examination.

BUSINESS LOAN ORIGINATIONS BY LOAN SIZE				
LOAN AMOUNT	NUMBER	PERCENT BY NUMBER	DOLLARS (\$000)	PERCENT BY \$
\$100,000 or Less	417	82	\$13,260	34
\$100,000 - \$250,000	55	11	\$ 9,176	24
\$250,000 to \$1 Million	36	7	\$16,180	42
Total	508	100	\$38,616	100

As shown by the preceding chart, 82 percent of the loan originations were for \$100,000 or less.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

I. LENDING TEST (CONTINUED)

Community Development Lending

The bank has made a relatively high level of community development loans. Since the last examination, the bank originated seven multifamily housing loans totaling \$4,301,000. Four of the multifamily loans were extended in moderate-income census tracts, and the remaining three were extended in middle-income census tracts. Because of the bank's high level of community development lending in the assessment area, loans outside the assessment area for community development are considered in the performance evaluation.

In 1996, the bank extended 31 qualified community development loans totaling \$29,505,085. The most significant loans were to the following organizations:

ORGANIZATION	LOAN AMOUNT
Agency for Community Treatment Services (ACTS)	\$2,215,540
First Christian Church of Largo	\$1,331,250
First Housing Development Corp. of Florida, Inc.	\$5,000,000
Goodwill Industries	\$3,004,445
Metropolitan Ministries	\$7,475,000
Presbyterian Homes of Pasco	\$5,200,000
Suncoast Family YMCA	\$2,308,788
Tampa Bay Community Reinvestment Corp.	\$1,221,289

The percentage breakdown of dollars extended to these organizations by loan purpose is as follows:

40%	Finance multipurpose care facilities
29%	Finance short-term working capital
19%	Finance multifamily and single-family affordable housing
8%	Finance recreational facilities
4%	Loan pool participation

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

I. LENDING TEST (CONTINUED)

Innovative or Flexible Lending Practices

The bank participates in a variety of innovative and flexible lending programs in conjunction with local government or housing agencies. The bank's record of originating loans in these programs is considered successful, as detailed below.

Tampa Challenge Fund. The bank is a charter member and financial participant in the City of Tampa's Challenge Fund. Loans are guaranteed by the City of Tampa and offer liberal underwriting standards and reduced interest rates. The program is targeted at housing rehabilitation in economically distressed areas and construction of single-family dwellings in the Tampa area. In 1995, the bank originated 89 loans for \$4,742,982, or 32.5 percent of the 1995 Tampa Challenge dollars lent. In 1996, the bank originated 46 loans for \$2,065,542, or 14 percent of the 1996 Tampa Challenge dollars lent.

Hillsborough County Challenge Program. This program is modeled after the Tampa Challenge Fund program and provides financing for low- and moderate-income families throughout the county. The program offers below-market-rate loans, home ownership budgeting and training, and liberal qualifying standards. The loans are guaranteed by Hillsborough County. In 1995, the bank originated 70 loans for \$3,727,062, or 48 percent of the total dollars lent. In 1996, the bank originated 36 loans for \$2,357,825, or 28 percent of the total Hillsborough Challenge dollars lent.

St. Petersburg's Working to Improve our Neighborhoods (WIN) Coalition Program. The WIN program consists of a "First Time Home Buyers" program, which will provide up to 95 percent financing on owner-occupied homes for purchase, construction, and purchase/home improvement purposes, as well as loans for the repair or renovation of owner-occupied housing. The interest rate for the WIN rehabilitation program is 2 percent less than the lending institution's market rate for similar loans. From October 1, 1995, to September 30, 1996, the bank originated six loans for \$326,000.

Clearwater Housing Challenge 2000 Program. This program is a guaranteed loan program through the City of Clearwater developed to help low- and moderate-income individuals become homeowners. The program is administered by Clearwater Neighborhood Housing Services, Inc. During 1995 and 1996, SunTrust originated six loans totaling \$326,000.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

I. LENDING TEST (CONTINUED)

Innovative or Flexible Lending Practices (Continued)

City of Largo - "Sold on Largo" Partnership Program. This program was established in December 1994 to assist low- and moderate-income first-time homebuyers. All qualified borrowers are required to complete a recognized home ownership program. The City of Largo provides a five-year guaranty of loan principal with a buy back from the lender. The program offers interest-free secured second mortgages for existing units requiring rehabilitation. Down payment and closing cost assistance is available. During 1996, the bank originated four loans totaling \$168,355.

In addition to participating in the above programs, the bank originated FHA/VA mortgages requiring little or no money down through federal insurance or guaranty of the loans. SunTrust has originated 20 FHA/VA loans totaling \$1,598,620.

II. INVESTMENT TEST

Investment and Grant Activity

SunTrust's record of helping to meet the credit needs of its assessment area through qualified investments that benefit the assessment area is less than satisfactory. The bank's investment portfolio totaled approximately \$499.4 million as of December 31, 1996, and consists primarily of U. S. Treasury and agency securities and mortgage-backed securities. Only two investments totaling \$109,000 are qualified investments under CRA. These investments were equity investments in nonprofit community development corporations - First Housing Development Corporation of Florida, Inc., and the Tampa Bay Black Business Investment Corporation (TBBBIC). The bank also provided grants/contributions totaling \$505,708, of which \$139,000 (28 percent) was related to community development.

Responsiveness to Credit and Community Development Needs

The bank exhibits an adequate level of responsiveness to credit and community economic needs. However, the volume of qualified investments is low. The qualified investments target both the assessment area and a broader geographic region. Although these investments are not especially complex or innovative, funding for these corporations is not typically provided by the private market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

III. SERVICE TEST

Retail Banking Services

Distribution of Branches

The distribution of branches in the assessment area was analyzed by comparing the percentage of branches in each census tract income level to the percentage of the population residing in each census tract type.

Branch Distribution

CENSUS TRACT TYPE	HILLSBOROUGH COUNTY		PINELLAS COUNTY		ASSESSMENT AREA	
	BRANCH PERCENT	POPULATION PERCENT	BRANCH PERCENT	POPULATION PERCENT	BRANCH PERCENT	POPULATION PERCENT
Low-income	0.00	3.7	0.00	2.0	0.00	2.9
Moderate-income	21.7	17.6	23.5	15.0	22.5	16.3
Middle-income	30.4	42.9	47.1	50.7	37.5	46.8
Upper-income	47.8	35.8	29.4	32.3	40.0	34.0
Total	100.0	100.0	100.0	100.0	100.0	100.0

The branches seem to be accessible to geographies and individuals of different income levels in the assessment area. No branches are located in low-income census tracts; however, only 2.9 percent of the population lives in low-income census tracts. The remainder of the low-income population resides in moderate- and middle-income census tracts. Eight (22.5 percent) of the bank's branches are located in moderate-income census tracts. Four branches are in census tracts adjacent to low- and moderate-income census tracts. Additionally, a remote drive-in facility is located in a moderate-income tract. The availability of services and branch hours are not significantly different among branches located in census tracts of different income levels.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

III. SERVICE TEST (CONTINUED)

Retail Banking Services (Continued)

Record of Opening and Closing Branches

During the review period, the bank closed one branch in a middle-income census tract and one branch in a moderate-income census tract was consolidated into a branch less than one mile away. The drive-in facility of this consolidated branch remained open at the former location. Two branches in upper-income census tracts were relocated to other locations in upper-income census tracts. The bank has adopted a policy on branch closings, relocations, consolidations, and reductions in service.

The bank opened five full-service branches during the review period. None were opened in low-income census tracts; one was opened in a moderate-income census tract; three were opened in middle-income census tracts; and one was opened in an upper-income census tract.

Alternative Service Delivery Systems

SunTrust has a network of 48 ATMs within its assessment area. The ATM network includes three workplace¹ ATMs and eleven remote ATMs (not located on branch premises).

The bank has also implemented a 24-hour banking service, TeleBank 24. This service provides account information, fund transfer capabilities, loan application options, and check services such as stop payment and new check ordering over the telephone. A local telephone number and a toll-free number are available for nationwide access. Moreover, 24-hour service associates are available if personal service is required.

Range of Services by Geography

The availability and the extent of services by geography were reviewed. The bank's service delivery systems are accessible to geographies and individuals of different income levels, and its services and business hours do not vary in a way that inconveniences its assessment area. The level of branch services available to all geographies is the same throughout the assessment area. The availability of ATM locations, extended hours, and Saturday banking hours across geographies was considered to be adequate.

¹ ATMs placed on-site at participating businesses with more than 500 employees.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

III. SERVICE TEST (CONTINUED)

Community Development Services

The bank has engaged in a significant number and variety of community development services.

The following chart depicts the most significant activities during the review period:

ORGANIZATION INVOLVED	SERVICE PROVIDED
Hillsborough County Challenge Fund	Participated in affordable housing educational program for first-time homebuyers. 12 seminars were held in 1996.
Gingerbread/Wellington School	Classes visited branch for lessons on banking.
The Salvation Army	Provided 2 seminars on basic information about SunTrust Bank and its banking services, with emphasis on financial responsibility.
Seffner Community Center; Greater Seffner, Mango, Dover, and Valrico Chambers of Commerce	Participated in affordable housing education program for first-time homebuyers.
Minority Business Enterprise Development	Provided 2 weeks of financing opportunities and education and recognized the achievements of minority-owned businesses.
Century 21 Shaw Realty	Provided first-time homebuyers seminar for 21 families in Brandon/Plant City/Seffner area.
Clearwater Neighborhood Housing Services, Inc.	Participated in affordable housing educational program for first-time homebuyers. (9/26/96 and 11/12/96)
Consumer Credit Counseling Service, Inc.	Participated in "Wise Use of Credit" seminar.
Tampa Bay Community Development Corporation	Participated in training program for first-time and low- to moderate-income homebuyers.
Tampa Bay Community Reinvestment Corporation	Strategic Planning Conference
Urban Partnership for Economic Revitalization	Organization meeting to determine needs and develop solutions to revitalizing neglected areas. (10/9/96 and 12/12/96)
H.O.P.E. Expo '96	Participated in affordable housing educational program for first-time homebuyers.
Century 21 Reynolds Realty	Provided first-time homebuyers seminar for 17 families. (10/29/96 and 11/7/96)

In addition to the above, the bank conducted numerous financial service seminars throughout the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (CONTINUED)

III. SERVICE TEST (CONTINUED)

Community Development Services (Continued)

SunTrust has engaged in a reasonable level of community development services during the review period. The review indicated that a wide array of community development services has been provided and used throughout the assessment area. The majority of bank services are targeted to the assessment area, although some services benefit the statewide area.

COMPLIANCE WITH ANTIDISCRIMINATION LAWS

SunTrust solicits applications from all segments of its communities, including low- and moderate-income areas. The bank's policies and internal control procedures are adequate to ensure that the evaluation of credit applications is based solely on financial and economic considerations. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations. No practices have the intent or effect of discouraging applications.

Credit policies and procedures are reviewed periodically by management to ensure that they are nondiscriminatory toward any protected class. In addition, all of the bank's employees receive training on the requirements of Regulation B - Equal Credit Opportunity Act and the Fair Housing Act at least annually.

No evidence of prohibited discrimination or other illegal credit practices was noted during the examination.

SCOPE OF EXAMINATION

TIME PERIOD REVIEWED: June 5, 1995, to February 18, 1997

FINANCIAL INSTITUTION	PRODUCTS REVIEWED
SunTrust Bank, Tampa Bay	HMDA-reportable Loans Small Business Loans Consumer Loans

AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
None.	None.	None.

